

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Douglas Stephen Taylor

**Debtor 1**

Noelle Denise Taylor

**Debtor 2**

PSECU

**Movant(s)**

v.

Douglas Stephen Taylor

Noelle Denise Taylor

**Respondent(s)**

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:22-BK-00900-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 58

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Douglas Stephen Taylor and Noelle Denise Taylor, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Paragraph 3 contains a conclusion of law to which no response is required.
4. Admitted. Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
5. Upon information and belief, the averment as stated in Paragraph 5 is admitted.
6. Admitted.
7. Paragraph 7 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: April 11, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
pmurphy@dplglaw.com  
*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Tuesday, April 11, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

**Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

James Valecko, Esquire  
WELTMAN, WEINBERG & REIS CO., LPA  
436 Seventh Avenue, Suite 2500  
Pittsburgh, PA 15219  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Ronald Reagan Federal Building  
228 Walnut Street, Room 1190  
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire